EXHIBIT 19A-L

19.A.

*****CONFIDENTIAL DEPOSITION****

IN THE UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

Leighton Technologies, LLC,)

Plaintiff-Counterclaim)

Defendant,)Case No.

-vs-)04Civ

Oberthur Card Systems, S.A.,)2496(CM)

Defendant-Counterclaim)

Plaintiff.)

- - - o0o - - -

Deposition of KEITH R. LEIGHTON, a witness herein, called by the Defendant-Counterclaim Plaintiff, as if upon cross-examination under the statute, and taken before Luanne Stone, a Notary Public within and for the State of Ohio, pursuant to the issuance of notice and subpoena, and pursuant to the further stipulations of counsel herein contained, on Sunday, the 9th day of October, 2005 at 9:00 o'clock A.M., at the Renaissance Hotel, the City of Cleveland, the County of Cuyahoga and the State of Ohio.

*****CONFIDENTIAL DEPOSITION*****

twice as big is going to have twice as much pressure as a ram which is half its size?

MR. GUTKIN: Lacks foundation. You can answer.

MR. JACOBS: Let me -- let me refresh the question. I think you're right. It's a terribly asked question.

MR. GUTKIN: It's kind of interesting, though, where you were going.

THE WITNESS: You're getting into physics where I'm not a person to be doing that, so --

THE VIDEOGRAPHER: Off the record.

(At this time a short recess was had.)

THE VIDEOGRAPHER: Back on the record.

BY MR. JACOBS:

Q Mr. Leighton, prior to going off the record, you indicated that you weren't a physicist. So, don't answer; don't guess; don't speculate, but based upon your experience in doing this for many, many years, is it -- is it accurate to say that the pressure in the cold press of a plastic laminating -- plastic card laminating press is much higher than that in the heating

press?

MR. GUTKIN: Vague and ambiguous. You can answer.

THE WITNESS: I really don't know the answers to that question.

BY MR. JACOBS:

Q Okay.

A Because when I went out to Motorola, I had some equipment I wasn't even familiar with, and I had a can of worms because I did not know the pressures that they had on their laminator. The controls were all messed up.

Q Well, with the plastic card laminators, have you ever, prior to going to Motorola, ever worked on a dual-stack laminator for plastic laminated cards?

A No.

Q Okay. Now, at Motorola, you laminated into the card an RF/ID.

A Yes.

Q What -- what -- what are the components in an RF/ID module or whatever it's called? Let me go back. What do you call that thing that you laminate into the card?

19.B.

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SOUTHERN DISTRICT OF NEW YORK

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A That was at CSI or formerly 2B System.
Q What kind of press did they have there?
A Single-stack laminator.
Q And was that -- during that lamination step again, you -- you -- you -- you had a heating phase?
A Right.
Q And you had a cooling phase?
A Correct.
Q And was the cooling -- was the pressure used during the cooling at least ten percent greater than the pressure used in the heating?
A Yes.
Q That you remember very clearly?
A That I remember very clearly.
Q But you don't remember that, in fact, at Motorola, the pressure during the cooling was at least ten percent greater than the heating; is that correct?
A The reason I don't remember it at Motorola is they had different size rams. We had a single pump doing two different size rams, so we maintained a ram pressure.
Q So, so, it's possible that you used a

pressure at Motorola during the cooling that was at least ten percent greater than the pressure during the heating; is that correct?

A I'm not sure. I'm not sure.

Q Do you have any notes of what you did at Motorola?

A No.

Q Who did you work with at Motorola?

A One of the gentlemen's name was Ken Thompson, and the other one was Noel Eberhard. Don't ask me to spell it.

Q Now, you described earlier how at Motorola they had a large dwell time, correct?

A Right.

Q And that was because they had the wrong type of press?

A Correct.

Q And that meant because that the pressure in the cooling press was lower than the pressure in the heating press, correct?

A Correct, that's correct.

Q And, so, they went to -- how did they correct that problem?

19.C.

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IN THE UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

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Q Anything else?
A It would be much easier. No, I would say that would cover it.
Q Are the pressures and temperatures you use in your invention different than that that were used at Motorola?
MR. GUTKIN: Vague and ambiguous. Lacks foundation, compound.
THE WITNESS: I don't recall all the temperatures that I used at Motorola, because I was in there using many different temperatures at Motorola. When I left, I don't know what they did.
BY MR. JACOBS:
Q I'm not asking what they did while -- after you left. I'm asking solely while you were there. You can't testify to what you don't know.
A Yeah.
Q Well, Motorola did use a heating phase and followed by a cooling phase, correct?
A Right, that's correct.
Q Did -- at Motorola, the pressures during the cooling phase were greater than the pressures during the heating phase?

A I don't know about the surface pressure. Their ram pressure might have been greater, but what the surface pressure of the plastic core sheet, I'm not certain what that was.

Q Did you ever know what the surface pressure at the core sheet was at Motorola?

A No, I don't think I ever got that broken down mathematically.

Q And you don't have any documents that would refresh your recollection --

A No.

Q -- as to that?

A No. Everything I did at Motorola stayed at Motorola as far as information is concerned. The documentation that I made was in a scrapbook log that was kept at Motorola.

Q Do you know where that log is today?

A No, I don't.

Q Did you make entries in that log?

A Only what I was doing there. Yes, I made entries in that log, but those entries that I made in the log would only be good for that type of laminator. It would not work on any other laminator.

19.D.

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that correct?
A: Yes, and they were very happy with what I produced, and then they said: Okay, now we're over the easy part; let's go to the hard part, and they changed their contract agreement, giving me an air wound coil the size of a dollar to place in their card, much more difficult to do. So, all my formulas had to again be changed, and, then, they provided me with a live chip in the first ones.
Q: What temperature did -- when you made this first card or cards that proved your idea, what temperature -- did you use a heating phase and a cooling phase followed by --
A: Yes.
Q: -- a recycling phase?
A: But I cannot recall the temperatures that I used there or the pressures that I used.
Q: How did you determine which temperatures you should use in the heating phase?
A: I liquefied the plastic that I had

19.E.

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Q: So, you -- and you took this Empire PVC, and you melted it.
A: That is correct.
Q: Did you melt it in the laminating press?
A: That is correct.
Q: So, you ran a number of experiments; is that correct?
A: Yes.
Q: Until you determined that you had reached a temperature where the plastic would melt?
A: That's correct.
Q: How did you determine what pressure you should use in the heating cycle?
A: That was through many tests to go through to find out if I was achieving a point where it would be coming out smooth without voids in the plastic which I would overcome by the second laminating step in the first place. I mean, they had a requirement they wanted to use. I had to assist them in what they wanted to do.
Q: Could you explain how you determined the pressure during the heating phase?

A: I kept trying until I found a temperature and pressure that would produce a smooth prelam to begin with, which took many tests.

Q: Did you use a different pressure during the cooling than you did during the heating?

A: Yes.

Q: Did you use a higher pressure during the cooling than you used in the heating?

A: I don't recall all of that, because they had an antique circuit board, single function pump, and they changed the plumbing on their rams, so what the actual pressures were, I'm not sure.

Q: Well, based on your experience and your knowledge, was the pressure higher in the cooling than the pressure in the heating?

A: I tried to obtain that, yes.

Q: So, you tried -- your goal was to obtain a higher pressure during the cooling than in the heating?

A: Right, from my previous knowledge that I use on all the card manufacturing.

Q: But because of the machinery and the lack of valves, you don't know exactly how much higher it was in the cooling than it was in the heating, correct?
A: Right. They had a gauge that showed bar pressure, but that was pump pressure, and they changed the plumbing, trying to get the two laminators to close at the same time.
Q: And this --
A: By doing that, it threw all records off.
Q: And this plumbing was changed prior to the time of your second visit to Motorola?
A: I'm not sure of the time that they changed it, but they realized they had a problem. They had a Burkle serviceman coming out there, trying to advise them what to do.
Q: That wasn't Mr. Sanko?
A: No.
Q: Someone else?
A: It was a man from Burkle, and that man from Burkle agreed with me. I met the

19.F.

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pin this down. In your first couple of days at Motorola during your second visit when you proved out your idea --

A: Uh-huh.

Q: -- it was impossible because of whatever happened to the presses to tell how much higher the pressure was in the cooling than it was in the heating?

A: That's correct.

Q: How big was the -- going back to your first couple of days when they gave you about the dime size electronics, recalling your testimony from yesterday, the chip sat inside the wire wound antenna, correct?

A: Right.

Q: How much smaller was the chip than the inner diameter of the coil?

A: It could be a couple thousandths of an inch thinner. The coil actually acted as a buffer, taking the pressure off the chip on the particular card.

Q: Yeah.

A: But they had, in turn -- the ones that they had been producing, they had that premade up with a soft gel acting as a

19.G.

IN THE UNITED STATES DISTRICT COURT

FOR THE SOUTHERN DISTRICT OF NEW YORK

- - - - -

LEIGHTON TECHNOLOGIES, LLC,)

plaintiff,)

vs.) Case No.

) 04 Civ. 02496 (CM)

OBERTHUR CARD SYSTEMS, S.A.)

and OBERTHUR CARD SYSTEMS)

OF AMERICA CORP.,)

defendants.)

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(Volume III - pages 522 through 875)

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A Yes.
Q Did the heating step follow the -- I'm sorry. Did the cooling step follow the heating step?
A Yes.
Q Was it immediate?
A They had a problem with their laminator because they modified their rams and the plumbing from the pump.
Q All right. Yeah. You said this at your earlier deposition, it was -- it was a printed circuit board laminator; is that right?
A Right. That's correct.
Q And it was designed so that the pressure during cooling would be less than during heating, generally?
A We didn't actually know the pressures.
Q Okay.
A Because they have a bar pressure on that laminator that they could only get a pump pressure reading, but on this laminator that Motorola had, they had the hot side a large ram, the cold side was a smaller ram, and those should actually be reversed for card manufacturing purpose.

Q Right.
A They tried to modify the rams in their laminator.
Q They tried --
A To make them close in equal time, but they couldn't do that while I was there.
Q Did they try that prior to when you started working there?
A Yes.
Q Okay.
A I'm not sure when they modified their rams. That was done before I come in.
Q Do you remember the length of time -- well, let's start at the beginning. I'd like you to walk us through your memory of the process that was used to make the card in Exhibit A. In other words, if you could walk us through the steps, heating started at this temperature and this pressure for this long, if you remember.
MR. GUTKIN: Object to form.
A I don't recall. I don't recall temperatures.
Q You don't recall any temperatures at all?
A No.
Q No ranges at all?

19.H.

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had a service man from Burkle doing everything that they asked him to do.

Q Right.

A And he told them, junk it, get a plastic card laminator.

Q Right. But they didn't junk it, right?

A That's correct.

Q That's the laminator that you were forced to use when you were consulting for Motorola?

A That's all they had when I was there.

Q And you knew one problem that you had to fix was the pressure during heating and cooling at least had to be the same, the ram pressures had to be the same, right, or else you weren't going to make an acceptable card?

A In working with it, we tried different tests.

Q Okay. And that was one test you tried?

A That's one test we tried, yes.

Q Right. Because that's exactly what you said earlier, that's why --

A Right.

Q -- that printed circuit board press was not good for making cards, because the pressures had to be at least the same in the heating and

cooling rams; is that right?
A Right. And we didn't even know the pressures even.
Q Okay.
A Whether I was -- whether on the cold side it could be less than on the hot side. I didn't know.
Q You didn't know what actually was happening in the press?
A That's correct.
Q But you at least knew that the ram on the cooling side was much smaller than the ram on the hot side, right?
A Right.
Q So you knew the pressure was less generally, right?
A Right.
Q As it existed for printed circuit boards, right?
A Right.
Q But you couldn't measure exactly what it was as changes were made to it?
A Right. The gauges weren't showing what they were doing.
Q But your goal was to make it at least the

19.I.

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same, right, heating and cooling, you knew that much going into it, that that was a goal, to make --

A Right.

Q -- acceptable cards?

A I tried to make a product using their wrong equipment.

Q Right. And one way you tried to fix their wrong equipment was to equalize -- at least equalize the pressures in the heating and the cooling phases.

A Trying to, yeah.

Q Okay. And did you succeed at that, do you know, or you couldn't tell for sure?

A I didn't know for sure.

Q But you think you did, didn't you? You think you got the pressure at least to the point in cooling where it was in the heating phase when you were at Motorola?

A I don't know that.

Q You don't know for sure?

A No.

Q You're not -- you have no idea whether you did or not?

A No.

Q Do you believe you did?
A No.
Q How close do you think you came?
A I come -- oh, if I had a card that looked good, the failure rate was very bad, I was crushing chips and breaking chips.
Q So if you -- if you got good results, then you thought that you had increased the pressure on the cooling side sufficiently so that you weren't damaging chips as much?
A If I was damaging chips, it showed on the stainless steel laminating plates, because it embossed them.
Q Right, but that's not exactly what I asked.
I'm trying to figure out how much pressure you put on the cooling side when you were working at Motorola. Are you with me?
A Yes, but I don't know what it was.
Q Right. That's -- that's what I'm trying to explore.
A Um-hum.
Q You said that based on the equipment, it was not -- it was not possible for you to tell exactly what the pressures were.
A That's correct.

Q Right? But you knew you wanted to increase the pressure on the cooling side from what had existed in the Motorola Burkle laminator at the time; is that right?
A That's what I was trying to do --
Q Okay.
A -- because that's what I had foreknowledge of before I even started.
Q And although you couldn't measure it, you knew that you increased the pressure sufficiently in the cooling phase when you made cards in which the electronic element was not crushed; is that fair?
A Repeat that one.
Q In other words, whatever pressure you were able to achieve in the cooling phase, even though you couldn't measure it, you knew it was sufficient when the chips weren't crushed?
MR. GUTKIN: Object to form.
A I'm not fully understanding what you're saying here.
Q Think about it.
A In the lamination process that I had at Motorola --
Q There was no gauge on the machine for you

to tell what the pressure was during cooling?
A Only pump pressure.
Q Okay. And what was the pump pressure that you read?
A I don't recall.
Q Do you have any idea at all?
A No.
Q Okay. And --
A I know that in the process you have a tray of cards going into the hot side, at the same time you have a tray of cards going into the cold side, and when you close the laminator on the hot side, you're also closing it on the cold side.
Q Okay. And there were a number of platens in that -- in those presses?
A That's correct, four daylight openings.
Q And there was no compensation in there?
A No.
Q So the full force of all the platens was on the cards in the hot phase and the cold phase?
A That's correct.
Q Okay. And when you say -- what units were you able to read on the Burkle laminator that you were using for Motorola of pressure? What

were the units of pressure you could read off the machine?
A They had what they call a bar pressure.
Q Okay. And bar pressure is units of what?
A I'm not sure what their bar pressure units were because all I had to go by was on the pump, they had a gauge, it was a dial gauge that told the --
Q What were the units --
A PSI pressure.
Q You must remember the units on the dial gauge. What were the units on there?
A I'm not -- I'm not sure.
Q You can't remember?
A No, I can't remember.
Q Really?
A Really.
Q They were in some units of bar pressure on that gauge?
A Pump pressure.
Q Pump pressure.
A Yeah. Pump pressure can go up to maybe 1,000 pounds of pump pressure.
Q Okay. And it's just --
A Those gauges are normally zero to 1,000

pounds on pump pressure.
Q Okay. So you can't remember exactly, but the units probably were pounds of pressure on the Burkle --
A Right.
Q -- press?
A Right.
Q Okay. And there was some pressure on the hot side and some pressure on the cold side --
A Right.
Q -- right?
And it wasn't compensated, so that means that whatever sheet was at the bottom of all the different platens got all the force of all the platens on top; is that correct?
A That's correct.
Q We're not talking -- we're talking about some pressure on the hot side between zero and 1,000 pounds, right?
A Right.
Q And some pressure on the cold side in the Motorola Burkle laminator between zero and 1,000 pounds?
A Right.
Q Right?

19.J.

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Q So what's the minimum pressure, given everything you know? You were there, you were working with the Burkle machine, you were the engineer hired to fix it, right? What's the minimum pressure that any of the cards saw on the hot side of the Burkle laminator used at Motorola?

A I don't know.

Q What -- it was at least 400 pounds, right?

A Your bottom platen carried the weight of the top platen of four daylight openings.

Q Right.

A So I'd say start off with -- before any pressure is applied to it, just bringing the laminator to closing, you had close to 2,000 pounds of dead weight on top of the PVC sheets.

Q Okay. So that's 2,000 pounds minimum on the card before you apply any pressure?

A Correct.

Q And the gauge on the machine was 1,000, it went up to 1,000 pounds?

A That's pump pressure.

Q Pump pressure. Okay.

In addition to the pressure of the weight of the plates, that's what you mean by

"pump pressure"?
A Correct.
Q So the pump on the press could apply up to another 1,000 pounds or so on top of the weight of all the platens?
A Right. Having a large ram on the hot side, when you start to raise, the pumped fluid goes into the ram, it's going to go to the biggest opening first.
Q Okay.
A Lesser resistance. The cold side, unfortunately, raised up slower than the hot side did in closing the laminator, then I had to equalize. So I to this day have no idea what the pressures were on the hot or the cold side.
Q Okay. But you understand --
A Or the bar pressures.
Q You understand that -- I'm not a -- I'm a chemical engineer but I'm not a -- I've never done anything in this field, okay? So you have to help me understand the ranges of the magnitudes of what we're talking about, okay? And you have to help the judge and the jury understand the kind of numbers we're dealing with. Do you understand that?

A I understand that, yes.
Q So for you to say "I have no idea," it helps us certainly to put it in perspective when you talk about the numbers that we're talking about here, like thousands of pounds, okay? Do you understand what I'm saying?
A Um-hum.
Q So although you may not remember exactly, it is very helpful for us for you -- for you to give us your best memory of the approximate numbers that we're talking about. Is that fair?
A Yes.
Q Okay. So let's go back to the hot side of the Burkle laminator used at Motorola.

You said during the heating phase that was used in that press, okay, the minimum pressure on any of the laminated cards would be 2,000 pounds; is that right?

MR. GUTKIN: Object to form.

A Yes, I believe that's -- that would be true.
Q And is that true of the cards they were making when they were there as well as the cards that you worked with when you began consulting for them?

MR. GUTKIN: Object to form.
A I pulled so many tests there, I can't re -- recall what pressures that were used.
Q Right. But -- that's going back to what you said a minute ago. But again, I'm trying to get general pressures, all right?
A Um-hum.
Q We're still talking about a lot of pressure --
A Right.
Q -- in the tests that you ran, right?
A Right.
Q We're not talking about five pounds of pressures, we're talking about hundreds, thousands of pounds of pressure.
A That's correct. Right.
Q That's what you used in the heating phase, right?
A Right.
Q At Motorola.
A Right.
Q And in the cooling phase you were trying to get pressures that approached what was used in the heating phase, right?
A It was impossible for me to get a pressure

greater than the hot side using the same pump because my fluids went at the same time closing the hot side.

Q Okay. But you were trying to get -- in terms of the minimum pressure on the cooling side, it was at least the type of range we're talking about here, in the range of 2,000 pounds on the cooling side, right?

A Right. Close to that, yes.

Q Correct. And it would increase as you went up in the laminator --

A Um-hum.

Q -- to the higher layers and levels where there were additional platens.

A Right.

Q Right?

So you were trying to equalize the pressure on the cooling side to the pressure on the heating side in the Burkle laminator at Motorola; is that right?

A They were trying to.

Q They were trying to and you were trying --

A Right.

Q -- to too, right?

A Yeah.

Q Why are you differentiating between you and them? They were trying when you got there, right?

A Because they were trying by mechanical means by changing the plumbing prior to my going there and trying to change the dwell times electronically in their circuit boards, in the controls. I had no control of that.

Q Right. But I didn't ask you how it was being done, I just said you were trying to do the same thing, you were trying to increase the pressure during the cooling phase, weren't you, generally?

A I could do no more than shut their laminators. The pump took over the controls.

Q Okay. But you were trying to increase the pressure during the cooling phase, weren't you, at Motorola?

A All I was trying to do is come out with a product with what I had to work with.

Q Okay. But you knew at the time when you got there they said this laminator is backwards, it's for circuit boards, right?

A Right.

Q It's got a much smaller ram on the cooling

side, right?
A Right.
Q You knew that was a problem, right?
A That's a problem right off the bat.
Q And you found out they knew it was a problem too, right?
A Right.
Q You wanted to increase the pressure on the cooling side.
A Yeah, but they couldn't do it.
Q If you could get it to the same pressure as the heating side, that would have been a good thing, right?
A If they could have at least equalized it, but we couldn't achieve that goal.
Q Well, you didn't know if it was equalized or not, did you?
A No.
Q I thought you didn't know exactly what pressure you got on the cooling side?
A That's correct.
Q So it might have been equal, you don't know?
A I doubt it.
Q But you don't know for sure, do you?

A No, I don't.
Q And it might have been more, you don't know for sure, do you?
A No.
Q So you didn't know --
A No. I'll take that back. It was not more.
Q How do you know? You don't know for sure.
A Because we had more pressure from the ram size on the hot side.
Q Well, how do you know?
A Both openings closed at the same time.
Q But you said you were trying -- you said you were trying to equalize the values; do you remember that? You said that earlier, right?
A I don't recall whether I did or not.
Q Okay. But you were trying to, weren't you?
I remember you said it. You said it earlier today. You were trying to equalize the pressures on the heating and cooling side; do you remember that?
A No. I get confused in your question, so --
Q You do, okay. All right. Well, we'll let that testimony stand before. I don't want to test what you remember, if you said it earlier or not, but you did say you couldn't remember

exactly what the pressures are that you had on either side; do you remember that?

A I couldn't remember the pressures because I didn't know what they were.

Q Okay. So you don't know exactly what --

A No.

Q -- pressure --

A No.

Q -- you ultimately got on the heating side.

A No.

Q You don't know exactly what pressure you ultimately got on the cooling side.

A No.

Q Okay. But it was -- it was some pressure in the hundreds of thousands of pounds; is that right?

A Hundreds of thousands of --

Q Hundreds or thousands of pounds.

A Hundreds or thousands.

Q Right.

A Yeah.

Q For example, you said that the minimum pressure that would be experienced was on the order of 2,000 pounds on the heating or cooling side.

A Um-hum.
Q Is that right?
A Rephrase that.
Q The minimum pressure that would be experienced on either side, given the weight of the platens, was 2,000 pounds?
A That's correct.
Q And what was the size of the sheet that was being laminated, do you remember, in very --
A No.
Q -- approximate terms?
A No, I don't.
Q Well, it was --
A I don't remember.
Q But you got to remember generally. Again, we don't -- have no idea. We weren't there. We're not in this business. I mean, we're not talking about two inches by two inches, right?
A I would be guessing.
Q Okay. But I need your best approximation. It's not two inches by two inches?
A We were, I believe, cutting 24 up --
Q Okay.
A -- on a sheet.
Q And about how big was a sheet?

19.K.

IN THE UNITED STATES DISTRICT COURT

FOR THE SOUTHERN DISTRICT OF NEW YORK

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LEIGHTON TECHNOLOGIES, LLC,)

plaintiff,)

vs.) Case No.

) 04 Civ. 02496 (CM)

OBERTHUR CARD SYSTEMS, S.A.)

and OBERTHUR CARD SYSTEMS)

OF AMERICA CORP.,)

defendants.)

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(Volume III - pages 522 through 875)

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Continued videotaped deposition of KEITH LEIGHTON, a witness herein, called by the defendants as if upon cross-examination, and taken before David J. Collier, RPR, Notary Public within and for the State of Ohio, pursuant to Notice of Deposition and pursuant to the further stipulations of counsel herein contained, on Monday, the 23rd day of October, 2006 at 8:02 a.m., at the offices of Tackla & Associates, 1020 Ohio Savings Plaza, City of Cleveland, County of Cuyahoga and the State of Ohio.

remember that?
A Yes. I was wondering, can he read back through where we left off at?
Q Let me -- let me just pick up.
A I have to get my chain of thought here.
Q Yeah, let me just pick up with it, okay?
A Okay.
Q We were talking about the heat soak time, do you remember that, some period of time --
A Right.
Q -- that it takes?
A Right.
Q And you said 15 minutes or so.
A Right.
Q Okay. And then there is an additional time once the temperature is equalized across all the inlays of the heating cycle; is that right?
A Right. That's correct.
Q Okay. Do -- do the inlays -- in the process you used at Motorola, would the inlays see heat pretty immediately or would it take some amount of time before they would feel any heat?
A Well, to -- for the heat to go through the book entirely from top and bottom, we had to

shut the laminator, and this is where the pressure comes in uncontrolled, I'm not sure just how much, and we stay in it for a period of time to soften that plastic to be able to flow the inlays into the plastic.

Q Let me -- let me break that down, okay? Going back to what you said before, the press, the laminators heated --

A Right.

Q -- right, before the --

A Prior to -- right.

Q Prior to inserting the -- what would you call the inlay surrounded by the metal plates that are inserted?

A That's a book.

Q Okay. Is the entire book inserted?

A Right.

Q And a book has however many inlays surrounded by steel plates?

A That's correct.

Q And felt on the outside?

A Right.

Q Is that the book?

A Top and bottom. That would be the book.

Q Okay. And --

19.L.

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pre-lam between those plates.
Q Okay.
A So you'd have a buildup of close to 100 pounds.
Q Okay. So there would be a steel plate in between each one of the inlays --
A Right.
Q -- when you used four of them?
A Right.
Q Okay. So by --
A Top and bottom plates. Yes.
Q So by virtue of being in the book alone, what was the minimum pressure that the inlays would experience back at Motorola?
A Before closing the laminator?
Q Yeah.
A You would have the weight of the platens that were above it that weighed close to 400 pounds, plus it had the weight of the metal plates that were on top of the pre-lams, and I'd say -- I'd say roughly, if we used all daylight openings, which at that time we couldn't even do because we didn't have that many inlays, we had approximately 600 pounds before any contact with the top of the platen.